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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No. 97-178
Table of Allotments	)	RM-10099
FM Broadcast Stations	)	
(Rhinebeck and Rosendale, New York)	)	

To: The Commission

REPLY COMMENTS IN SUPPORT OF COUNTERPROPOSAL

State University of New York ("SUNY"), by its counsel, provides these comments in support of its counterproposal in the above-captioned matter. SUNY also reincorporates by reference its prior pleadings in this proceeding. Copies of SUNY's previous pleadings are attached for the Commission's convenience.

History

In a Notice of Proposed Rulemaking and Order to Show Cause, released by the Chief, Allocations Branch, on August 15, 1997 (the "NPRM"), the Commission requested comments on two mutually exclusive petitions for rulemaking proposing new allotments at West Hurley, New York (Channel 255A) and North Canaan, Connecticut (Channel *277A – which requires substitution of Channel 255A for unoccupied but applied-for Channel 273A at Rosendale, New York). On October 6, 1997, SUNY filed comments in response to the NPRM and counter-proposed the allotment of Channel *273A to Rhinebeck, New York as a reserved noncommercial educational channel and as the community's first local aural service. On October 21, 1997, SUNY filed Reply Comments supporting its counterproposal. On April 26, 2001, the FCC

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released Report No. 2480 establishing a 15 day deadline for comments supporting or opposing the counterproposal. Due to the length of time that has elapsed since SUNY last filed comments in this proceeding, SUNY is restating its Reply Comments of October 21, 1997. In sum, SUNY submits that its counterproposal would best serve the public interest and the FCC's allotment priorities.

Under the FCC's Well-Established Criteria for FM Allotments, the Allotment of Channel *273A to Rhinebeck is Preferred over the West Hurley or North Canaan Proposals

SUNY's counterproposal is preferred over the West Hurley and North Canaan proposals because the Commission's allotment policies favor the establishment of first local service and other public interest concerns. *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982), *recon. denied* 56 RR2d 48 (1984). First, allotting Channel 273A to Rhinebeck, New York would provide first local aural transmission service to the community, in accordance with Priority 3. Second, Rhinebeck, New York (population 7,762 persons) is a larger community than either West Hurley, New York (population 2,105 persons) or North Canaan, Connecticut (population 3,350 persons), according to the 2000 U.S. Census. In a choice among competing proposals that involved Priority 3, the Commission has uniformly preferred the larger community under Priority 4, based on a straight population comparison. *See, e.g., Blanchard, Louisiana and Stephens, Arkansas*, 8 FCC Rcd 7083 (1993), *rev. denied*, 10 FCC Rcd 9828 (1995); *Good Hope and Bostwick, Georgia*, 6 FCC Rcd 5796 (1990). Moreover, as SUNY has previously noted, the Town of Rhinebeck is listed in the 1990 U.S. Census, as well as the 1996 Rand McNally Commercial Atlas and Marketing guide, as a community. The Town of

Rhinebeck also has its own unique zip code and contains the typical government services, businesses and cultural activities of a community.[1]

Third, reserving Channel 273A for noncommercial educational use is consistent with Commission policies, because use of a reserved band channel (channels 200-220) is precluded by Channel 6 interference considerations. (SUNY reincorporates by reference its Comments and Counter Proposal and supporting Engineering Statement which justify the reservation.) Moreover, reserving Channel 273A would provide significant numbers of persons with a first or second noncommercial educational radio programming service, consistent with Section 396(a) of the Communications Act of 1934, which declares that the public interest is served by extending noncommercial educational broadcasting service to unserved and underserved areas. The Engineering Statement which accompanied SUNY's counterproposal stated that SUNY's proposal would provide first noncommercial educational service to 2,925 persons and a second noncommercial educational service to 11,334 persons. In addition, the SUNY proposal would provide a new noncommercial educational service to 274,242 persons. Fourth, while SUNY sympathizes with the applicants for Channel 273A at Rosendale, New York, who must select new transmitter sites, those applicants are not entitled to have their individual site preferences protected against SUNY's counterproposal or the other proposals in this rulemaking.

Finally, Sacred Heart University ("SHU") has claimed that public interest benefits will flow from the allotment of Channel 277A to North Canaan because Station WQQQ could be upgraded from 3 kilowatts to 6 kilowatts on Channel 273A with a site relocation. This public interest benefit is illusory. As shown in the Engineering Statement attached to SUNY's October

[1] For example, the Town of Rhinebeck has attributes of a "community" including a Town Supervisor, a Highway Garage, a Tax Collector, a Dog Control Officer, a Town Court, a

continued...

21, 1997 Reply Comments, Station WQQQ could be upgraded on its current channel with a site relocation (and could be upgraded, to some degree, at its current site or applied-for site). Thus, any public interest benefits associated with the upgrade of Station WQQQ are unrelated to SHU's proposal and should not be considered by the Allocations Branch in this proceeding.

For the reasons stated above, SUNY submits that its counterproposal is preferred to the West Hurley and North Canaan proposals under Commission rules, policies and precedent and that its counterproposal will best serve the public interest. SUNY reiterates its intention to apply for Channel *273A at the Town of Rhinebeck, New York, if allotted as proposed, and to promptly construct the station if the permit is awarded to SUNY.

Respectfully submitted,

STATE UNIVERSITY OF NEW YORK

By: Margaret L. Miller

Todd D. Gray
Margaret L. Miller
Barry S. Persh
Its Counsel

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202-776-2571

May 11, 2001

...continued

Recycling/Transfer Station, a Zoning and Planning Board and a pool.

STAMP & RETURN

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b),	)	MM Docket No. 97-178
Table of Allotments,	)	RM-8329
FM Broadcast Stations,	)	RM-8739
(West Hurley and Rosendale, New York,	)	
North Canaan and Sharon, Connecticut)	)	

To: Chief, Allocations Branch

COMMENTS AND COUNTERPROPOSAL OF SUNY

State University of New York ("SUNY"), by its counsel, provides these comments on, and counterproposal to, the Notice of Proposed Rulemaking and Order to Show Cause, released by the Chief, Allocations Branch, on August 15, 1997 (the "NPRM") with respect to the captioned matter.

The Commission Must Withhold Final Action in This Proceeding Pending Resolution of MM Docket 93-17

The NPRM requests comments on two mutually exclusive petitions for rulemaking proposing new allotments at West Hurley, New York (Channel 255A), and North Canaan, Connecticut (Channel *277A -- which requires substitution of Channel 255A for unoccupied but applied-for Channel 273A at Rosendale, New York). Yet, both of these proposals are fully contingent on resolution of another, earlier and still pending, allocation proceeding in MM Docket 93-17. On August 1, 1997, SUNY filed a Petition for Reconsideration of the *Memorandum Opinion and Order* in MM Docket 93-17 (the "Rosendale Proceeding").[1/]

[1/] *Report and Order* in MM Docket No. 93-17, 10 FCC Rcd 11471 (1995), *recon. denied on other grounds,* 11 FCC Rcd 3607 (1996), *app. for rev. denied on other grounds,*

In its Petition for Reconsideration in the Rosendale Proceeding, SUNY has urged that the Commission reserve Channel 273A for noncommercial educational use, grant the modification of license requested by SUNY to operate Station WFNP as a full-time noncommercial educational station on Channel *273A at Rosendale, allot Channel 255A at Rosendale as a non-reserved allotment, and direct the other pending applicants for the new channel at Rosendale to modify their applications to specify Channel 255A.[2/] Quite obviously, the Allocations Branch cannot proceed with the West Hurley or North Canaan allotments, or with the associated resultant allotment changes, all of which involve use of Channel 255A, until the issue of Station WFNP(FM)'s license modification to Channel *273A is resolved by the Commission or by judicial review.

The Allocations Branch acknowledges this dilemma in Footnote 1 of its NPRM, however, the parties to this proceeding should explicitly understand that the Rosendale proceeding takes precedence over this NPRM and that the Rosendale proceeding should be decided without regard to any possible outcome in this NPRM. Both petitioners in this proceeding, Raymond A Natole ("Natole") and Sacred Heart University ("SHU"), were parties to the Rosendale proceeding: Natole filed a defective counterproposal to allot Channel 255A to West Hurley in MM Docket 93-17 which is now the subject of this NPRM; SHU participated in MM Docket 93-17, applied for Channel 273A at Rosendale, New York, and instituted its North Canaan proposal long after the proceeding commenced in MM Docket 93-17. Neither Natole nor

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adopted June 23, 1997, released July 2, 1997 (FCC 97-226).

[2/] In its pleadings in MM Docket 93-17, SUNY had also indicated its willingness to have the license for Station WFNP(FM) modified to Channel *255A.

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The Allocations Branch acknowledges this dilemma in Footnote 1 of its NPRM, however, the parties to this proceeding should explicitly understand that the Rosendale proceeding takes precedence over this NPRM and that the Rosendale proceeding should be decided without regard to any possible outcome in this NPRM. Both petitioners in this proceeding, Raymond A Natole ("Natole") and Sacred Heart University ("SHU"), were parties to the Rosendale proceeding: Natole filed a defective counterproposal to allot Channel 255A to West Hurley in MM Docket 93-17 which is now the subject of this NPRM; SHU participated in MM Docket 93-17, applied for Channel 273A at Rosendale, New York, and instituted its North Canaan proposal long after the proceeding commenced in MM Docket 93-17. Neither Natole nor

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adopted June 23, 1997, released July 2, 1997 (FCC 97-226).

[2/] In its pleadings in MM Docket 93-17, SUNY had also indicated its willingness to have the license for Station WFNP(FM) modified to Channel *255A.

SHU can claim to be unaware of the pre-existing Rosendale proceeding and its ramifications for the use of Channels 273A and Channels 255A at Rosendale. The Allocations Branch must stay its hand on Natole's and SHU's proposals until MM Docket 93-17 is finally resolved.

SUNY Counterproposes the Allotment of Channel *273A to Rhinebeck as a Reserved Noncommercial Educational Channel and as the Community's First Local Aural Service

For the reasons given above, the instant proceeding cannot be resolved until MM Docket 93-17 is finally decided. In fact, this proceeding will be mooted when MM Docket 93-17 is decided in SUNY's favor. Yet, SUNY makes the counterproposal set forth here in order to preserve its rights to participate in this proceeding if it is not mooted by MM Docket 93-17.

SUNY counterproposes the allotment of Channel *273A to the Town of Rhinebeck, New York, as a reserved noncommercial educational channel, and the community's first local service. To accommodate this counterproposal, SUNY also proposes the substitution of Channel 255A for vacant Channel 273A at Rosendale, New York.

The Town of Rhinebeck is listed in the 1990 U.S. Census, as well as the 1996 Rand McNally Commercial Atlas and Marketing Guide, as a community and attributed with a substantial population of 7,558 persons. The Town of Rhinebeck has its own unique zip code. The Town of Rhinebeck contains the typical government services, businesses and cultural activities of a community. For example, the Town of Rhinebeck has attributes of a "community," including a Town Supervisor, a Highway Garage, a Tax Collector, a Dog Control Officer, a Town Court, a Recycling/Transfer Station, a Zoning and Planning Board, and a pool.

As stated in the attached Engineering Statement, the allotment of Channel *273A to the Town of Rhinebeck would provide first and second noncommercial educational service to a significant number of persons. There is no channel within the reserved portion of the FM band available for use because of the proximity of TV Station WGRB(TV) at Schenectady, NY, which operates on TV Channel 6. See attached Engineering Statement. As indicated in MM Docket 93-17, SUNY has long desired to provide an unlimited-time noncommercial educational service to the Dutchess County area and surrounding areas in New York. As also indicated in MM Docket 93-17, SUNY has been stymied in its attempts to modify its existing license to a non-reserved band channel for its noncommercial use. SUNY's counterproposal presents an opportunity for the Commission to fulfill its own allotment priorities by providing a first local aural transmission service to the Town of Rhinebeck, with its population of 7,558 persons, and to provide a first noncommercial educational radio service to an unserved and underserved population in the area.

Conclusion

For the foregoing reasons, SUNY requests that the Allocations Branch stay final action on this NPRM until such time as MM Docket 93-17, the Rosendale Proceeding, is finally resolved. Alternatively, SUNY Counter proposes the allotment of Channel 273A at the Town of Rhinebeck, New York, and its reservation for noncommercial educational use. SUNY intends to apply for Channel *273A at the Town of Rhinebeck, New York, if allotted as proposed herein and to promptly construct the station if the permit is awarded to SUNY.

Respectfully submitted,

STATE UNIVERSITY OF NEW YORK

By: Todd D. Gray

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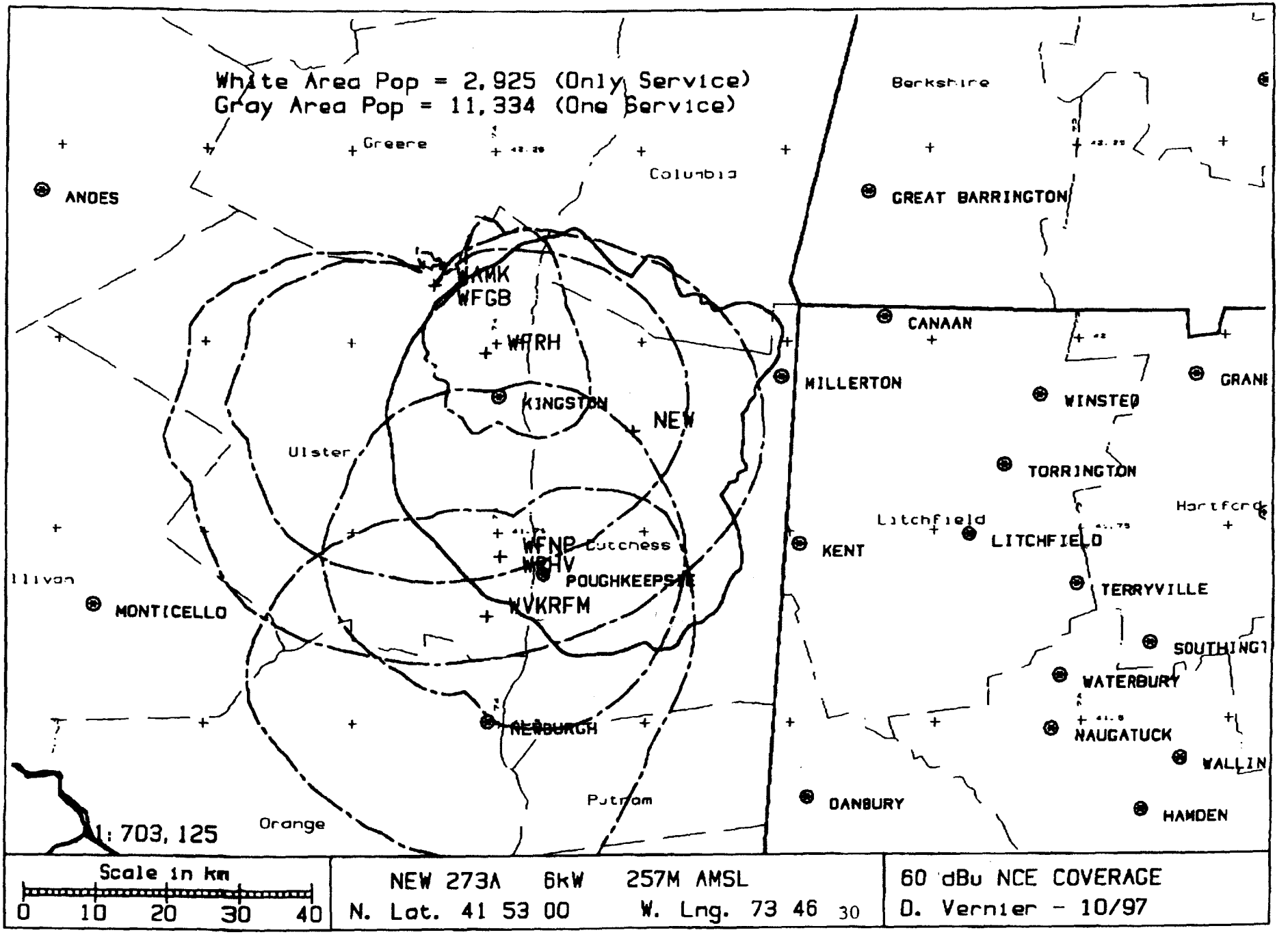
October 6, 1997

FIGURE # 1



Engineering Exhibit #EE-1 in support of the State University of New York counterproposal to MM Docket 97-178

General

In MM Docket 97-178, the Commission proposed to allocate channel 255A to West Hurley, NY or, alternately, 277A to North Canaan, CT both of which would provide a first local aural transmission service. The North Canaan allotment would also provide a first NCE service. Channel 277A is currently in use by radio station WQQQ at Sharon, CT. RM-8739 proposes the allotment and reservation of channel 273A at Sharon, CT for radio station WQQQ. In addition, channel 273A has already been allocated to the community of Rosendale, NY. The proposed rule making would substitute channel 255A for channel 273A at Rosendale. The State University of New York (SUNY) is proposing an alternative use for channel 273A, which it believes will better serve the public interest, convenience and necessity.

Proposed Amendment to the Table of FM Allotments

The proposed amendment to the table of FM allotments is as follows:

Community	Community Reference Coordinate	Proposed Allocation Coordinate	Present	Proposed
Rosendale, NY	41-50-38N 74-04-57W	41-55-45 74-07-44	273A	255A
Rhinebeck, NY	41-55-36 73-54-47	41-53-00 73-46-30	----	*273A

SUNY proposes the allocation of channel *273A to the community of Rhinebeck, NY as its first local service. SUNY further proposes that channel *273A be reserved for noncommercial use. The proposed allocation coordinates for Rhinebeck are 12.4km from the community's reference coordinates along the 293 degree radial, well within the class contour of 16.2km. The proposed reference coordinates were chosen in order to provide new service an NCE white area. SUNY requests that its coordinates be used in this proceeding.

For channel 255 at Rosendale, the proposed reference coordinates are 10.1km from the community's reference coordinates, well within the 16km class contour.

The Community of Rhinebeck

Rhinebeck is located in Dutchess County, New York. It is listed in the 1990 US Census with a total community population of 7,558 persons. Rhinebeck is incorporated with elected officials and contains typical government services found in communities. It is also the home of the Dutchess County Fairgrounds and Northern Dutchess Hospital. It has an active business district, parks and unique attractions.

Reservation for NCE use

SUNY requests that the proposed channel *273 allocation be reserved for noncommercial educational use. SUNY has determined that a new NCE station in the reserved portion of the FM band is not feasible due to interference issues with TV channel 6 as set forth in section 73.525 of part 73. Table TV6 is a TV channel 6 vs. FM study showing that the interference from a class A facility would impact at least 4,179 persons. This study is based upon use of channel 220 at 100 meters and 6kW circular ERP. Channel 220 is the highest reserved channel and produces the least interference to TV channel 6. Since channel 220 cannot be used, SUNY believes that no other reserved channel can be used.

Population Served

Rhinebeck has a total population of 7,558 persons and is located in Dutchess county, New York. Dutchess county has a 1990 population of 259,462 persons. The proposed new channel *273A facility would cover 2,593 sq. km and serve 274,242 persons. In addition, 2,925 NCE "white area" persons would receive a new NCE first service and 11,334 NCE "gray area" persons would receive second service from the proposed allocation. Figure 1 is a map showing the contours of the stations used in calculating the white and gray areas.

Summary

The SUNY proposal would provide new first local service to Rhinebeck, NY, an active community of 7,558 persons. It would also provide first NCE service to 2,925 persons and a second NCE service to 11,334 persons. Additionally, the SUNY proposal would provide a new NCE service to 274,242 persons. SUNY believes that their proposal provides the best service to the most people.

Engineering prepared by:

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SUNY Exhibit # EE-1, Table # TV6

Educational FM/TV Channel 6 Interference area

Interference	------ WRGB Channel 6 ------	---- Proposed Ch. 220 ----
--- Site -----	C/R 311 m AAT	C/R 100 m AAT
Lat 41-53-00	Latitude: 42-38-12	Latitude: 41-53-00
Lon 73-46-30	Longitude: 73-59-45	Longitude: 73-46-30

Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
.0	4.3	167.1	81.5	274	93.3	54.9	35.1*	.0	4.27	70.2	6.00	90.0
1.0	4.3	167.0	81.5	274	93.3	54.9	35.1*	1.0	4.27	70.3	6.00	90.0
2.0	4.3	166.9	81.5	279	93.3	55.0	34.9*	2.0	4.28	70.4	6.00	90.0
3.0	4.3	166.9	81.5	279	93.3	55.0	35.0*	3.0	4.28	70.5	6.00	90.0
4.0	4.3	166.8	81.5	279	93.3	55.0	35.0*	4.0	4.29	70.5	6.00	90.0
5.0	4.3	166.8	81.5	279	93.3	55.0	35.0*	5.0	4.29	70.6	6.00	90.0
6.0	4.3	166.7	81.6	279	93.3	55.0	35.0*	6.0	4.29	70.7	6.00	90.0
7.0	4.3	166.7	81.6	279	93.3	55.0	35.0*	7.0	4.29	70.8	6.00	90.0
8.0	4.3	166.6	81.6	279	93.3	55.0	35.0*	8.0	4.30	70.9	6.00	90.0
9.0	4.3	166.6	81.6	279	93.3	55.0	35.0*	9.0	4.30	71.0	6.00	90.0
10.0	4.3	166.5	81.7	279	93.3	55.0	35.0*	10.0	4.30	71.1	6.00	90.0
11.0	4.3	166.5	81.7	279	93.3	55.0	35.0*	11.0	4.30	71.1	6.00	90.0
12.0	4.3	166.5	81.7	279	93.3	54.9	35.1*	12.0	4.30	71.2	6.00	90.0
13.0	4.3	166.4	81.7	279	93.3	54.9	35.1*	13.0	4.31	71.3	6.00	90.0
14.0	4.3	166.4	81.8	279	93.3	54.9	35.1*	14.0	4.31	71.4	6.00	90.0
15.0	4.3	166.3	81.8	279	93.3	54.9	35.1*	15.0	4.31	71.5	6.00	90.0
16.0	4.3	166.3	81.9	279	93.3	54.9	35.1*	16.0	4.31	71.6	6.00	90.0
17.0	4.3	166.2	81.9	279	93.3	54.9	35.1*	17.0	4.31	71.6	6.00	90.0
18.0	4.3	166.2	81.9	279	93.3	54.9	35.2*	18.0	4.32	71.7	6.00	90.0
19.0	4.3	166.1	82.0	279	93.3	54.8	35.2*	19.0	4.32	71.8	6.00	90.0
20.0	4.3	166.1	82.0	279	93.3	54.8	35.2*	20.0	4.32	71.9	6.00	90.0
21.0	4.3	166.0	82.0	279	93.3	54.8	35.2*	21.0	4.32	72.0	6.00	90.0

22.0	4.3	166.0	82.1	284	93.3	55.0	35.0*	22.0	4.33	72.1	6.00	90.0
23.0	4.3	165.9	82.1	284	93.3	54.9	35.1*	23.0	4.33	72.2	6.00	90.0
24.0	4.3	165.9	82.2	284	93.3	54.9	35.1*	24.0	4.33	72.2	6.00	90.0
25.0	4.3	165.9	82.2	284	93.3	54.9	35.1*	25.0	4.34	72.3	6.00	90.0
26.0	4.3	165.8	82.3	284	93.3	54.9	35.1*	26.0	4.34	72.4	6.00	90.0
27.0	4.3	165.8	82.3	284	93.3	54.9	35.1*	27.0	4.34	72.5	6.00	90.0
28.0	4.3	165.7	82.4	284	93.3	54.8	35.2*	28.0	4.34	72.6	6.00	90.0
29.0	4.3	165.7	82.4	284	93.3	54.8	35.2*	29.0	4.34	72.7	6.00	90.0
30.0	4.3	165.7	82.5	284	93.3	54.8	35.2*	30.0	4.35	72.8	6.00	90.0
31.0	4.3	165.6	82.5	284	93.3	54.8	35.2*	31.0	4.35	72.8	6.00	90.0
32.0	4.3	165.6	82.6	284	93.3	54.8	35.3*	32.0	4.35	72.9	6.00	90.0
33.0	4.3	165.5	82.6	284	93.3	54.7	35.3*	33.0	4.35	73.0	6.00	90.0
34.0	4.3	165.5	82.7	284	93.3	54.7	35.3*	34.0	4.35	73.1	6.00	90.0
35.0	4.4	165.5	82.7	284	93.3	54.7	35.3*	35.0	4.36	73.2	6.00	90.0
36.0	4.4	165.4	82.8	284	93.3	54.7	35.4*	36.0	4.36	73.3	6.00	90.0
37.0	4.4	165.4	82.8	284	93.3	54.6	35.4*	37.0	4.36	73.3	6.00	90.0
38.0	4.4	165.4	82.9	284	93.3	54.6	35.4*	38.0	4.36	73.4	6.00	90.0
39.0	4.4	165.3	83.0	284	93.3	54.6	35.5*	39.0	4.36	73.5	6.00	90.0
40.0	4.4	165.3	83.0	284	93.3	54.6	35.5*	40.0	4.37	73.6	6.00	90.0
41.0	4.4	165.3	83.1	284	93.3	54.5	35.5*	41.0	4.37	73.7	6.00	90.0
42.0	4.4	165.2	83.1	284	93.3	54.5	35.5*	42.0	4.37	73.8	6.00	90.0
43.0	4.4	165.2	83.2	284	93.3	54.5	35.6*	43.0	4.37	73.9	6.00	90.0
44.0	4.4	165.2	83.3	284	93.3	54.5	35.6*	44.0	4.37	73.9	6.00	90.0
45.0	4.4	165.2	83.3	284	93.3	54.4	35.6*	45.0	4.38	74.0	6.00	90.0
46.0	4.3	165.2	83.4	284	93.3	54.4	35.7*	46.0	4.34	72.9	6.00	90.0
47.0	4.3	165.1	83.5	284	93.3	54.4	35.7*	47.0	4.31	71.8	6.00	90.0
48.0	4.3	165.1	83.6	284	93.3	54.3	35.7*	48.0	4.28	70.7	6.00	90.0
49.0	4.2	165.1	83.7	284	93.3	54.3	35.8*	49.0	4.24	69.6	6.00	90.0
50.0	4.2	165.1	83.7	284	93.3	54.3	35.8*	50.0	4.21	68.5	6.00	90.0
51.0	4.2	165.1	83.8	284	93.3	54.2	35.8*	51.0	4.18	67.4	6.00	90.0
52.0	4.1	165.1	83.9	284	93.3	54.2	35.9*	52.0	4.14	66.3	6.00	90.1
53.0	4.1	165.1	84.0	284	93.3	54.2	35.9*	53.0	4.11	65.2	6.00	90.0
54.0	4.1	165.1	84.1	284	93.3	54.1	35.9*	54.0	4.08	64.1	6.00	90.0
55.0	4.1	165.1	84.1	284	93.3	54.1	36.0*	55.0	4.05	63.0	6.00	90.0

Interference	----- WRGB Channel 6 -----						---- Proposed Ch. 220 ----				
--- Site ----	C/R 311 m AAT						C/R 100 m AAT				
Lat 41-53-00	Latitude: 42-38-12						Latitude: 41-53-00				
Lon 73-46-30	Longitude: 73-59-45						Longitude: 73-46-30				
Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
56.0	4.0	165.2	84.2	284	93.3	54.1	36.0*	56.0	4.01	61.9	6.00	90.1
57.0	4.0	165.2	84.3	284	93.3	54.0	36.0*	57.0	3.98	60.8	6.00	90.1
58.0	4.0	165.2	84.4	284	93.3	54.0	36.1*	58.0	3.96	59.7	6.00	90.0
59.0	3.9	165.2	84.4	284	93.3	54.0	36.1*	59.0	3.92	58.6	6.00	90.1
60.0	3.9	165.2	84.5	284	93.3	53.9	36.1*	60.0	3.89	57.5	6.00	90.0
61.0	3.8	165.2	84.6	284	93.3	53.9	36.2*	61.0	3.85	56.4	6.00	90.0
62.0	3.8	165.2	84.7	284	93.3	53.9	36.2*	62.0	3.81	55.3	6.00	90.0
63.0	3.8	165.2	84.7	284	93.3	53.8	36.2*	63.0	3.77	54.2	6.00	90.0
64.0	3.7	165.2	84.8	284	93.3	53.8	36.3*	64.0	3.73	53.1	6.00	90.0
65.0	3.7	165.3	84.9	284	93.3	53.8	36.3*	65.0	3.68	52.0	6.00	90.1
66.0	3.6	165.3	85.0	284	93.3	53.7	36.3*	66.0	3.64	50.9	6.00	90.1
67.0	3.6	165.3	85.0	284	93.3	53.7	36.4*	67.0	3.59	49.8	6.00	90.1
68.0	3.6	165.3	85.1	284	93.3	53.7	36.4*	68.0	3.55	48.7	6.00	90.1
69.0	3.5	165.4	85.2	284	93.3	53.7	36.4*	69.0	3.51	47.6	6.00	90.1
70.0	3.5	165.4	85.2	284	93.3	53.6	36.5*	70.0	3.46	46.5	6.00	90.1
71.0	3.4	165.4	85.3	284	93.3	53.6	36.5*	71.0	3.41	45.4	6.00	90.1
72.0	3.4	165.4	85.3	284	93.3	53.6	36.5*	72.0	3.37	44.3	6.00	90.1
73.0	3.3	165.5	85.4	284	93.3	53.5	36.6*	73.0	3.32	43.2	6.00	90.1
74.0	3.3	165.5	85.5	284	93.3	53.5	36.6*	74.0	3.27	42.1	6.00	90.1
75.0	3.2	165.5	85.5	284	93.3	53.5	36.6*	75.0	3.22	41.0	6.00	90.1
76.0	3.2	165.6	85.6	284	93.3	53.5	36.6*	76.0	3.17	39.9	6.00	90.1
77.0	3.1	165.6	85.6	284	93.3	53.5	36.7*	77.0	3.13	38.8	6.00	90.1
78.0	3.1	165.6	85.7	284	93.3	53.4	36.7*	78.0	3.08	37.7	6.00	90.1
79.0	3.0	165.7	85.7	284	93.3	53.4	36.7*	79.0	3.03	36.6	6.00	90.1
80.0	3.0	165.7	85.8	284	93.3	53.4	36.7*	80.0	2.99	35.5	6.00	90.1

Interference	----- WRGB Channel 6 -----						---- Proposed Ch. 220 ----				
--- Site ----	C/R 311 m AAT						C/R 100 m AAT				
Lat 41-53-00	Latitude: 42-38-12						Latitude: 41-53-00				
Lon 73-46-30	Longitude: 73-59-45						Longitude: 73-46-30				
Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
81.0	2.9	165.7	85.8	284	93.3	53.4	36.8*	81.0	2.94	34.4	6.00	90.1
82.0	2.9	165.8	85.9	284	93.3	53.3	36.8*	82.0	2.90	33.3	6.00	90.1
83.0	2.9	165.8	85.9	284	93.3	53.3	36.8*	83.0	2.85	32.2	6.00	90.1
84.0	2.8	165.8	86.0	284	93.3	53.3	36.8*	84.0	2.81	31.1	6.00	90.1
85.0	2.8	165.8	86.0	284	93.3	53.3	36.9*	85.0	2.78	30.0	6.00	90.1
86.0	2.8	165.9	86.1	284	93.3	53.3	36.9*	86.0	2.78	28.9	6.00	90.1
87.0	2.8	165.9	86.1	284	93.3	53.2	36.9*	87.0	2.78	27.8	6.00	90.1
88.0	2.8	165.9	86.2	284	93.3	53.2	36.9*	88.0	2.78	26.7	6.00	90.1
89.0	2.8	165.9	86.2	284	93.3	53.2	36.9*	89.0	2.78	25.6	6.00	90.1
90.0	2.8	165.9	86.2	284	93.3	53.2	37.0*	90.0	2.78	24.5	6.00	90.1
91.0	2.8	165.9	86.3	284	93.3	53.2	37.0*	91.0	2.78	25.3	6.00	90.1
92.0	2.8	165.9	86.3	284	93.3	53.1	37.0*	92.0	2.78	26.2	6.00	90.1
93.0	2.8	165.9	86.4	284	93.3	53.1	37.0*	93.0	2.78	27.1	6.00	90.1
94.0	2.8	165.9	86.4	284	93.3	53.1	37.1*	94.0	2.78	28.0	6.00	90.1
95.0	2.8	165.9	86.5	284	93.3	53.1	37.1*	95.0	2.78	28.9	6.00	90.1
96.0	2.8	165.9	86.5	284	93.3	53.1	37.1*	96.0	2.78	29.8	6.00	90.1
97.0	2.8	165.9	86.6	284	93.3	53.1	37.1*	97.0	2.78	30.7	6.00	90.2
98.0	3.9	165.2	87.1	284	93.3	52.8	31.4	98.0	3.95	31.5	6.00	84.2
99.0	4.0	165.2	87.1	284	93.3	52.8	31.4	99.0	3.99	32.4	6.00	84.2
100.0	4.0	165.2	87.2	284	93.3	52.8	31.5	100.0	4.04	33.3	6.00	84.2
101.0	4.1	165.2	87.3	284	93.3	52.7	31.5	101.0	4.09	34.2	6.00	84.2
102.0	4.1	165.2	87.4	284	93.3	52.7	31.6	102.0	4.14	35.1	6.00	84.3
103.0	4.2	165.2	87.5	284	93.3	52.7	31.6	103.0	4.19	36.0	6.00	84.3
104.0	4.2	165.2	87.6	284	93.3	52.6	31.7	104.0	4.25	36.8	6.00	84.3
105.0	4.3	165.2	87.7	284	93.3	52.6	31.7	105.0	4.30	37.7	6.00	84.3
106.0	4.3	165.2	87.8	284	93.3	52.5	31.8	106.0	4.35	38.6	6.00	84.3

Interference	----- WRGB Channel 6 -----	---- Proposed Ch. 220 ----
--- Site ----	C/R 311 m AAT	C/R 100 m AAT
Lat 41-53-00	Latitude: 42-38-12	Latitude: 41-53-00
Lon 73-46-30	Longitude: 73-59-45	Longitude: 73-46-30

Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
107.0	4.4	165.2	87.8	284	93.3	52.5	31.8	107.0	4.39	39.5	6.00	84.3
108.0	4.5	165.2	87.9	284	93.3	52.5	31.9	108.0	4.45	40.4	6.00	84.3
109.0	4.5	165.2	88.0	284	93.3	52.4	31.9	109.0	4.50	41.3	6.00	84.3
110.0	4.6	165.2	88.1	284	93.3	52.4	32.0	110.0	4.55	42.1	6.00	84.3
111.0	4.6	165.2	88.2	284	93.3	52.4	32.0	111.0	4.61	43.0	6.00	84.3
112.0	4.7	165.2	88.3	284	93.3	52.3	32.1	112.0	4.66	43.9	6.00	84.3
113.0	4.7	165.2	88.4	284	93.3	52.3	32.1	113.0	4.71	44.8	6.00	84.4
114.0	4.8	165.2	88.5	284	93.3	52.2	32.2	114.0	4.76	45.7	6.00	84.4
115.0	4.8	165.2	88.6	284	93.3	52.2	32.2	115.0	4.81	46.6	6.00	84.4
116.0	4.9	165.2	88.7	284	93.3	52.1	32.3	116.0	4.86	47.5	6.00	84.4
117.0	4.9	165.2	88.8	284	93.3	52.1	32.3	117.0	4.91	48.3	6.00	84.4
118.0	5.0	165.2	88.9	284	93.3	52.1	32.4	118.0	4.96	49.2	6.00	84.4
119.0	5.0	165.3	89.0	284	93.3	52.0	32.4	119.0	5	50.1	6.00	84.4
120.0	5.0	165.3	89.1	284	93.3	52.0	32.5	120.0	5.05	51.0	6.00	84.4
121.0	5.1	165.3	89.2	284	93.3	51.9	32.5	121.0	5.10	51.9	6.00	84.4
122.0	5.1	165.3	89.3	284	93.3	51.9	32.6	122.0	5.14	52.8	6.00	84.5
123.0	5.2	165.3	89.4	284	93.3	51.9	32.6	123.0	5.18	53.6	6.00	84.5
124.0	5.2	165.4	89.5	284	93.3	51.8	32.7	124.0	5.22	54.5	6.00	84.5
125.0	5.3	165.4	89.5	284	93.3	51.8	32.7	125.0	5.26	55.4	6.00	84.5
126.0	5.3	165.4	89.6	284	93.3	51.8	32.8	126.0	5.30	56.3	6.00	84.5
127.0	5.3	165.5	89.7	284	93.3	51.7	32.8	127.0	5.33	57.2	6.00	84.5
128.0	5.4	165.5	89.8	284	93.3	51.7	32.8	128.0	5.37	58.1	6.00	84.5
129.0	5.4	165.5	89.9	284	93.3	51.6	32.9	129.0	5.41	59.0	6.00	84.5
130.0	5.4	165.6	90.0	284	93.3	51.6	32.9	130.0	5.44	59.8	6.00	84.5
131.0	5.5	165.6	90.1	284	93.3	51.6	33.0	131.0	5.47	60.7	6.00	84.6
132.0	5.5	165.6	90.1	284	93.3	51.5	33.0	132.0	5.51	61.6	6.00	84.5

Interference	----- WRGB Channel 6 -----						---- Proposed Ch. 220 ----					
--- Site ----	C/R 311 m AAT						C/R 100 m AAT					
Lat 41-53-00	Latitude: 42-38-12						Latitude: 41-53-00					
Lon 73-46-30	Longitude: 73-59-45						Longitude: 73-46-30					
Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
133.0	5.5	165.7	90.2	284	93.3	51.5	33.1	133.0	5.54	62.5	6.00	84.6
134.0	5.6	165.7	90.3	284	93.3	51.5	33.1	134.0	5.57	63.4	6.00	84.6
135.0	5.6	165.8	90.4	284	93.3	51.4	33.1	135.0	5.61	64.3	6.00	84.6
136.0	5.7	165.8	90.5	284	93.3	51.4	33.2	136.0	5.65	65.8	6.00	84.6
137.0	5.7	165.8	90.6	284	93.3	51.4	33.2	137.0	5.71	67.3	6.00	84.6
138.0	5.8	165.9	90.7	284	93.3	51.3	33.3	138.0	5.77	68.8	6.00	84.6
139.0	5.8	165.9	90.8	284	93.3	51.3	33.4	139.0	5.83	70.4	6.00	84.6
140.0	5.9	166.0	90.9	284	93.3	51.2	33.4	140.0	5.88	71.9	6.00	84.6
141.0	5.9	166.0	90.9	279	93.3	51.0	33.7	141.0	5.93	73.4	6.00	84.7
142.0	6.0	166.0	91.0	279	93.3	51.0	33.7	142.0	5.99	74.9	6.00	84.7
143.0	6.0	166.1	91.1	279	93.3	51.0	33.8	143.0	6.04	76.5	6.00	84.7
144.0	6.1	166.1	91.2	279	93.3	50.9	33.8	144.0	6.09	78.0	6.00	84.7
145.0	6.2	166.2	91.3	279	93.3	50.9	33.9	145.0	6.15	79.5	6.00	84.7
146.0	6.2	166.2	91.4	279	93.3	50.8	33.9	146.0	6.21	81.0	6.00	84.7
147.0	6.3	166.3	91.5	279	93.3	50.8	33.9	147.0	6.27	82.6	6.00	84.7
148.0	6.3	166.3	91.6	279	93.3	50.8	34.0	148.0	6.33	84.1	6.00	84.7
149.0	6.4	166.4	91.7	279	93.3	50.7	34.0	149.0	6.38	85.6	6.00	84.8
150.0	6.4	166.5	91.8	279	93.3	50.7	34.1	150.0	6.44	87.1	6.00	84.8
151.0	6.5	166.5	91.8	279	93.3	50.7	34.1	151.0	6.49	88.7	6.00	84.8
152.0	6.6	166.6	91.9	279	93.3	50.6	34.2	152.0	6.55	90.2	6.00	84.8
153.0	6.6	166.6	92.0	279	93.3	50.6	34.2	153.0	6.60	91.7	6.00	84.8
154.0	6.7	166.7	92.1	279	93.3	50.6	34.3	154.0	6.66	93.2	6.00	84.8
155.0	6.7	166.8	92.2	279	93.3	50.5	34.3	155.0	6.71	94.7	6.00	84.8
156.0	6.8	166.8	92.2	279	93.3	50.5	34.3	156.0	6.77	96.3	6.00	84.8
157.0	6.8	166.9	92.3	279	93.3	50.5	34.4	157.0	6.82	97.8	6.00	84.8
158.0	6.9	167.0	92.4	279	93.3	50.4	34.4	158.0	6.87	99.3	6.00	84.8

Interference	----- WRGB Channel 6 -----	---- Proposed Ch. 220 ----
--- Site ----	C/R 311 m AAT	C/R 100 m AAT
Lat 41-53-00	Latitude: 42-38-12	Latitude: 41-53-00
Lon 73-46-30	Longitude: 73-59-45	Longitude: 73-46-30

Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
159.0	6.9	167.0	92.4	274	93.3	50.2	34.7	159.0	6.90	101	6.00	84.9
160.0	7.0	167.1	92.5	274	93.3	50.2	34.7	160.0	6.95	102	6.00	84.9
161.0	7.0	167.2	92.6	274	93.3	50.2	34.7	161.0	7.00	104	6.00	84.9
162.0	7.1	167.2	92.6	274	93.3	50.2	34.8	162.0	7.05	105	6.00	84.9
163.0	7.1	167.3	92.7	274	93.3	50.1	34.8	163.0	7.10	107	6.00	84.9
164.0	7.1	167.4	92.7	274	93.3	50.1	34.8	164.0	7.14	108	6.00	84.9
165.0	7.2	167.5	92.8	274	93.3	50.1	34.8	165.0	7.19	110	6.00	84.9
166.0	7.2	167.5	92.8	274	93.3	50.1	34.9	166.0	7.24	112	6.00	84.9
167.0	7.3	167.6	92.9	274	93.3	50.1	34.9	167.0	7.28	113	6.00	84.9
168.0	7.3	167.7	92.9	274	93.3	50.0	34.9	168.0	7.32	115	6.00	84.9
169.0	7.4	167.8	93.0	274	93.3	50.0	34.9	169.0	7.36	116	6.00	84.9
170.0	7.4	167.9	93.0	274	93.3	50.0	35.0	170.0	7.41	118	6.00	84.9
171.0	7.5	167.9	93.0	274	93.3	50.0	35.0	171.0	7.45	119	6.00	84.9
172.0	7.5	168.0	93.1	270	93.3	49.8	35.2	172.0	7.48	121	6.00	85.0
173.0	7.5	168.1	93.1	270	93.3	49.8	35.2	173.0	7.52	122	6.00	85.0
174.0	7.6	168.2	93.1	270	93.3	49.8	35.2	174.0	7.56	124	6.00	85.0
175.0	7.6	168.3	93.2	270	93.3	49.8	35.2	175.0	7.60	125	6.00	85.0
176.0	7.6	168.4	93.2	270	93.3	49.8	35.3	176.0	7.64	127	6.00	85.0
177.0	7.7	168.4	93.2	270	93.3	49.8	35.3	177.0	7.68	128	6.00	85.0
178.0	7.7	168.5	93.2	270	93.3	49.7	35.3	178.0	7.72	130	6.00	85.0
179.0	7.8	168.6	93.2	270	93.3	49.7	35.3	179.0	7.76	131	6.00	85.0
180.0	7.8	168.7	93.3	270	93.3	49.7	35.3	180.0	7.81	133	6.00	85.0
181.0	7.8	168.8	93.2	270	93.3	49.7	35.3	181.0	7.81	133	6.00	85.0
182.0	7.8	168.9	93.2	270	93.3	49.7	35.3	182.0	7.81	133	6.00	85.0
183.0	7.8	168.9	93.2	270	93.3	49.8	35.3	183.0	7.82	133	6.00	85.0
184.0	7.8	169.0	93.1	265	93.3	49.6	35.4	184.0	7.80	133	6.00	85.0

Interference	----- WRGB Channel 6 -----						---- Proposed Ch. 220 ----				
--- Site ----	C/R 311 m AAT						C/R 100 m AAT				
Lat 41-53-00	Latitude: 42-38-12						Latitude: 41-53-00				
Lon 73-46-30	Longitude: 73-59-45						Longitude: 73-46-30				
Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	U/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
185.0	7.8	169.1	93.1	265	93.3	49.6	35.4	185.0	7.81	133	6.00	85.0
186.0	7.8	169.2	93.1	265	93.3	49.6	35.4	186.0	7.81	133	6.00	85.0
187.0	7.8	169.3	93.0	265	93.3	49.6	35.4	187.0	7.81	133	6.00	85.0
188.0	7.8	169.3	93.0	265	93.3	49.7	35.4	188.0	7.82	133	6.00	85.0
189.0	7.8	169.4	92.9	265	93.3	49.7	35.4	189.0	7.82	134	6.00	85.0
190.0	7.8	169.5	92.9	265	93.3	49.7	35.3	190.0	7.83	134	6.00	85.0
191.0	7.8	169.6	92.9	265	93.3	49.7	35.3	191.0	7.83	134	6.00	85.0
192.0	7.8	169.7	92.8	265	93.3	49.7	35.3	192.0	7.84	134	6.00	85.0
193.0	7.8	169.7	92.8	265	93.3	49.8	35.3	193.0	7.84	134	6.00	85.0
194.0	7.8	169.8	92.7	265	93.3	49.8	35.2	194.0	7.84	134	6.00	85.0
195.0	7.9	169.9	92.7	265	93.3	49.8	35.2	195.0	7.85	134	6.00	85.0
196.0	7.9	170.0	92.6	265	93.3	49.8	35.2	196.0	7.85	134	6.00	85.0
197.0	7.8	170.0	92.5	261	93.3	49.7	35.4	197.0	7.84	134	6.00	85.0
198.0	7.8	170.1	92.5	261	93.3	49.7	35.3	198.0	7.84	134	6.00	85.0
199.0	7.9	170.2	92.4	261	93.3	49.7	35.3	199.0	7.85	134	6.00	85.0
200.0	7.9	170.3	92.3	261	93.3	49.7	35.3	200.0	7.85	134	6.00	85.0
201.0	7.9	170.4	92.3	261	93.3	49.8	35.2	201.0	7.86	134	6.00	85.0
202.0	7.9	170.4	92.2	261	93.3	49.8	35.2	202.0	7.87	135	6.00	85.0
203.0	7.9	170.5	92.1	261	93.3	49.8	35.2	203.0	7.87	135	6.00	85.0
204.0	7.9	170.6	92.1	261	93.3	49.9	35.1	204.0	7.88	135	6.00	85.0
205.0	7.9	170.6	92.0	261	93.3	49.9	35.1	205.0	7.88	135	6.00	85.0
206.0	7.9	170.7	91.9	261	93.3	49.9	35.1	206.0	7.89	135	6.00	85.0
207.0	7.9	170.8	91.9	261	93.3	49.9	35.0	207.0	7.89	135	6.00	85.0
208.0	7.9	170.9	91.8	261	93.3	50.0	35.0	208.0	7.90	135	6.00	84.9
209.0	7.9	170.9	91.7	261	93.3	50.0	34.9	209.0	7.91	135	6.00	84.9
210.0	7.9	171.0	91.6	256	93.3	49.9	35.1	210.0	7.91	135	6.00	84.9

Interference	----- WRGB Channel 6 -----						---- Proposed Ch. 220 ----				
--- Site ----	C/R 311 m AAT						C/R 100 m AAT				
Lat 41-53-00	Latitude: 42-38-12						Latitude: 41-53-00				
Lon 73-46-30	Longitude: 73-59-45						Longitude: 73-46-30				
Bear. (deg)	Dist (km)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)	D/D (dB)	Bear. (deg)	Dist (km)	Haat (m)	ERP (kW)	F.S. (dBu)
211.0	7.9	171.1	91.5	256	93.3	49.9	35.1	211.0	7.90	135	6.00	85.0
212.0	7.9	171.1	91.4	256	93.3	49.9	35.0	212.0	7.91	135	6.00	84.9
213.0	7.9	171.2	91.4	256	93.3	50.0	35.0	213.0	7.91	135	6.00	84.9
214.0	7.9	171.3	91.3	256	93.3	50.0	34.9	214.0	7.92	135	6.00	84.9
215.0	7.9	171.3	91.2	256	93.3	50.0	34.9	215.0	7.93	135	6.00	84.9
216.0	7.9	171.4	91.1	256	93.3	50.1	34.8	216.0	7.93	136	6.00	84.9
217.0	7.9	171.5	91.0	256	93.3	50.1	34.8	217.0	7.94	136	6.00	84.9
218.0	7.9	171.5	90.9	256	93.3	50.2	34.7	218.0	7.95	136	6.00	84.9
219.0	7.9	171.6	90.8	256	93.3	50.2	34.7	219.0	7.95	136	6.00	84.9
220.0	8.0	171.7	90.7	256	93.3	50.2	34.6	220.0	7.96	136	6.00	84.9
221.0	8.0	171.7	90.6	256	93.3	50.3	34.6	221.0	7.97	136	6.00	84.9
222.0	8.0	171.8	90.5	256	93.3	50.3	34.5	222.0	7.98	136	6.00	84.8
223.0	8.0	171.8	90.4	256	93.3	50.4	34.5	223.0	7.98	136	6.00	84.9
224.0	8.0	171.9	90.3	256	93.3	50.4	34.4	224.0	7.99	136	6.00	84.8
225.0	8.0	172.0	90.2	256	93.3	50.5	34.4	225.0	8.00	136	6.00	84.8
226.0	8.0	172.0	90.1	252	93.3	50.3	34.5	226.0	8.00	137	6.00	84.9
227.0	8.0	172.1	90.0	252	93.3	50.4	34.5	227.0	8.02	137	6.00	84.8
228.0	8.0	172.1	89.9	252	93.3	50.4	34.4	228.0	8.04	138	6.00	84.8
229.0	8.1	172.2	89.8	252	93.3	50.5	34.4	229.0	8.06	138	6.00	84.8
230.0	8.1	172.2	89.7	252	93.3	50.5	34.3	230.0	8.08	139	6.00	84.8
231.0	8.1	172.3	89.5	252	93.3	50.5	34.3	231.0	8.10	139	6.00	84.8
232.0	8.1	172.4	89.4	252	93.3	50.6	34.2	232.0	8.12	140	6.00	84.8
233.0	8.1	172.4	89.3	252	93.3	50.6	34.2	233.0	8.13	140	6.00	84.8
234.0	8.2	172.5	89.2	252	93.3	50.7	34.1	234.0	8.15	140	6.00	84.8
235.0	8.2	172.5	89.1	252	93.3	50.7	34.0	235.0	8.18	141	6.00	84.7
236.0	8.2	172.6	89.0	252	93.3	50.8	34.0	236.0	8.20	141	6.00	84.7